

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO Court Address: 1437 Bannock Street Denver, CO 80202	<div style="text-align: right;"> FILED Document DATE FILED: May 31, 2005 5:08 PM CO Denver County District Court 2nd JD CASE NUMBER: 2005CV3171 Filing Date: May 31 2005 3:08PM MDT Filing ID: 5920547 Review Clerk: Suzann M Shotts </div> <div style="text-align: center;"> ▲ COURT USE ONLY ▲ </div>
Plaintiffs: MOUSTAFA ALISSA, individually and as next friend and guardian of, MOHAMED ALISSA, MAHMOUD ALISSA AHMAD ALISA, AICHA ALISA, ALI ALISA, IMAD ALISA, AMINA ALALIWIALLISSA and KHADIJA ALHDID. v. Defendants: PEGGY ANDERSON and STATE FARM INSURANCE COMPANIES	Case Number: 05 CV 3171 Div.: Ctrm.: 9
Attorneys for Plaintiffs Jeffrey S. Wittebort WALBERG, DAGNER & TUCKER, P.C. Quebec Centre II, Suite 300 7400 East Caley Avenue Englewood, CO 80111-6714 Phone Number: (303) 694-9300 Fax: (303) 694-9370 E-mail: jsw@wdtlaw.com Atty. Reg.#:13849	
MOTION FOR EXTENSION OF TIME TO FILE FOR DEFAULT	

Plaintiffs, by and through their attorneys, Jeffrey S. Wittebort of Walberg, Dagner & Tucker, P.C., respectfully requests this Honorable Court grant the parties a 45 day extension in which to file a Motion for Default against Defendant, as grounds therefore states as follows:

1. That Plaintiffs have filed a lawsuit against Defendant Peggy Anderson, the responsible party, for injuries sustained in an automobile accident.
2. That Ms. Anderson was served with a copy of the Summons and Complaint on this case on April 30, 2005, and as of today's date over 20 days have elapsed and she has not filed an answer.

3. That State Farm has acknowledged that this is an uninsured motorist case and the parties are attempting to resolve this matter. The parties have a settlement conference scheduled for June 6, 2005, in front of a mediator.
4. That the undersigned has discussed this Motion with Defendant State Farm's attorney, Stuart Jorgenson, and he does not oppose this Motion.

WHEREFORE, Plaintiffs respectfully request this Honorable Court grant them a 45 day extension of time in which to file their motion for default against Plaintiff Peggy Anderson.

DATED this _____ day of _____, 2005.

Respectfully submitted,

*The duly signed original held in the file located at Walberg,
Dagner & Tucker, P.C.*

By: _____
Jeffrey S. Wittebort, #13849
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE FOR DEFAULT** was FILED AND SERVED ELECTRONICALLY via CourtLink, the duly signed original held in the file located at Walberg, Dagner & Tucker, P.C., on May 31, 2005, copies addressed to:

Stuart S. Jorgensen
George D. Browning & Associates
11080 Circle Point, Suite 400
Westminster, CO 80020

/s/
Filing No. _____